

Message

From: Pierce - CDPHE, Gordon [gordon.pierce@state.co.us]
Sent: 3/27/2018 5:40:24 PM
To: Payton, Richard [Payton.Richard@epa.gov]
Subject: Re: Ozone EE draft

We are still reviewing it internally...probably be next week before it goes out for public comment. I'll let you know.

Gordon

On Tue, Mar 27, 2018 at 11:24 AM, Payton, Richard <Payton.Richard@epa.gov> wrote:

Gordon, I will not be able to review this before the public comment period, so please push it out as soon as you are ready.

Richard

From: Pierce - CDPHE, Gordon [mailto:gordon.pierce@state.co.us]
Sent: Tuesday, March 20, 2018 10:39 AM
To: Payton, Richard <Payton.Richard@epa.gov>
Subject: Ozone EE draft

Richard,

In case you would like to take a quick look, attached is the full in-review draft of the ozone EE for 9/2 and 9/4/17. It needs some additional edits, but it should answer the questions you had previously. Let me know what you think.

Thanks,

Gordon

----- Forwarded message -----

From: Payton, Richard <Payton.Richard@epa.gov>

Date: Wed, Mar 7, 2018 at 9:14 AM

Subject: RE: Technical Section -- EE demonstration

To: "Landes - CDPHE, Scott" <scott.landes@state.co.us>

Cc: "bradley.rink@state.co.us" <bradley.rink@state.co.us>

Sorry for the misunderstanding; I did not realize you all were looking for feedback on the drafts; I just wanted them early to get started on my concurrence action; I had not actually started that until I heard Bradley's voice mail this am.

In general, the drafts look like they will meet the need. Just some minor nitpicking on the conceptual model:

Section 3.3: I concur, you don't need to go into ozone augmentation by smoke in detail, based on other prior demos. I would like to see the conceptual model at least mention what you would expect ozone to be like on a 90 or 93 degree day in the 1st week of September, vs. what you did see, and a statement that the smoke likely augmented the concentration; that is your "concept" for ozone on the day and why it is an EE. EE smoke/ozone guidance, p. 7, Sec. 2.1 (https://www.epa.gov/sites/production/files/2016-09/documents/exceptional_events_guidance_9-16-16_final.pdf), the conceptual model should discuss "chemistry of event and non-event O₃ formation in the area". Also is to discuss "the regulatory significance of the proposed data exclusion". I did not see these elements.

Sections 4: To my knowledge, you are the only Q/d > 100 since the ozone/smoke guidance came out. The historical comparisons look excellent; rest covers the needs.

Richard

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Gordon Pierce
Program Manager
Technical Services Program



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Are you curious about ground-level ozone in Colorado? Visit our [ozone webpage](#) to learn more.

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